

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff

v.

- 1) Genesis GV80, VIN:
KMUHCESCOMU057308 with PR
license plate number JRF001.
- 2) \$980.00 in United States currency.
- 3) 2003 Ford F-350, VIN:
1FDWF37FX3EA19386, with PR
license plate number H72313.
- 4) \$491,243.93 in United States currency.
- 5) \$325,673.58 in United States currency.
- 6) \$34,010.00 in United States currency.
- 7) \$933.00 in United States currency.

Defendants *in Rem*.

CIVIL NO. 24-

**MOTION REQUESTING ISSUANCE OF WARRANT OF ARREST *IN REM*
PURSUANT TO SUPPLEMENTAL RULE G(3)(b)(i)**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, in support of its request for a warrant of arrest *in rem*, respectfully states as follows:

1. Plaintiff has commenced a forfeiture action against the Defendants *in Rem* pursuant to 18 U.S.C. §§ 981 (a)(1)(a) and (a)(1)(C), as well as 18 U.S.C.

§§ 371, 1956(h), and 2314.

2. The Defendants *in Rem* are in the possession, custody, and control of the United States.
3. Pursuant Supplemental Rule G(3)(b)(i) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, “the clerk must issue a warrant to arrest the property if it is in the government’s possession, custody, or control.”
4. Pursuant to Supplemental Rule G(3)(c), the warrant of arrest *in rem* must be delivered to a person or organization authorized to execute it.

WHEREFORE, the United States of America respectfully requests that the Clerk of Court issue a warrant of arrest *in rem* for the Defendants *in Rem*.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of September 2024.

W. STEPHEN MULDROW
United States Attorney

/s/Frank Norris
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